

January 24, 2024

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: CR Deputy

DR:24-CR-00137-AM

UNITED STATES OF AMERICA

§

Cause No.

§

§

INDICTMENT

v.

§

§

§

[VIO: COUNT ONE: 21 U.S.C. §

§

841(a)(1) & (b)(1)(A) and 846,

§

Conspiracy to Possess with Intent to

§

Distribute Cocaine; COUNT TWO: 21

§

U.S.C. §§ 952(a) and 960(a)(1) & (b)(1),

§

and 963, Conspiracy to Import Cocaine.]

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CASSANDRA SKY CLERE (4)

FORFEITURE

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. § 841(a)(1) & (b)(1)(A) and 846]

Beginning on or about October 2, 2022, and continuing to on or about July 15, 2023, in the
Western District of Texas, and elsewhere Defendants,

CASSANDRA SKY CLERE (4)

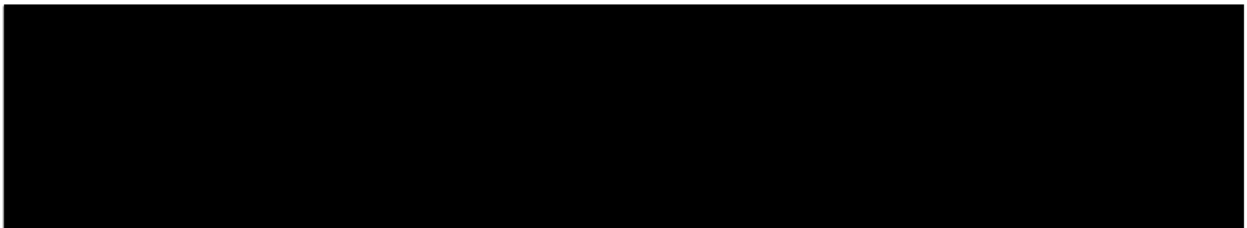
did knowingly and intentionally combine, conspire, confederate and agree together and with
others, to possess with the intent to distribute 5 kilograms or more of a mixture and substance

containing a detectable amount of cocaine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A) and 846.

COUNT TWO

[21 U.S.C. §§ 952(a) and 960(a)(1) & (b)(1)(B), and 963]

Beginning on or about October 2, 2022, and continuing to on or about July 15, 2023, in the Western District of Texas, Defendants,



CASSANDRA SKY CLERE (4)

did knowingly and intentionally combine, conspire, confederate, and agree together and with others, to import and cause to be imported into the United States 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, its salts, isomers, and salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1) & (b)(1)(B), and 963.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See FED. R. CRIM. P. 32.2]

I.

Drug Violations and Forfeiture Statutes

**[Title 21 U.S.C. § 841(a)(1)/(b)(1)(A), 846, 952(a), 960(a)(1)/(b)(1), & 963,
subject to forfeiture pursuant to Title 21 U.S.C. § 853(a)(1) & (2).]**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of property,

including any items listed below, upon conviction and as a part of sentence pursuant to FED. R.

CRIM. P. 32.2 and Title 21 U.S.C. § 853(a)(1) & (2), which state:

Title 21 U.S.C. § 853. Criminal forfeitures

(a) Property subject to criminal forfeitures.

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; ...

This Notice of Demand for Forfeiture includes but is not limited to the following.

1. **\$38,685.00, More or Less, in United States Currency; and**
2. **\$58,695.00, More or Less, in United States Currency.**

A TRUE BILL

FOREPERSON

JAIME ESPARZA
United States Attorney

By: T. Paul Markovits
T. PAUL MARKOVITS
Assistant United States Attorney